

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

RYAN, LLC,

Plaintiff,

v.

FEDERAL TRADE COMMISSION,

Defendant.

Case No. 3:24-cv-986-E

UNOPPOSED MOTION TO INTERVENE AS PLAINTIFFS

Pursuant to Federal Rule of Civil Procedure 24(a)(2), The Chamber of Commerce of the United States of America, Business Roundtable, Texas Association of Business, and Longview Chamber of Commerce (intervenors) respectfully move to intervene as plaintiffs as of right in the above-captioned proceeding. Alternatively, intervenors respectfully move the Court for permission to intervene as plaintiffs pursuant to Federal Rule of Civil Procedure 24(b). Intervenors' contentions of fact and law, and arguments and authorities, are set forth in intervenors' Brief In Support of Unopposed Motion To Intervene As Plaintiffs, filed contemporaneously with the filing of this motion.

Neither Plaintiff nor Defendant opposes intervenors' intervention in this case. However, as set forth below and in the attached brief, intervenors and Defendant

have differing views on the impact (or lack thereof) that intervention should have on the existing scheduling order.

Dated: May 8, 2024

Respectfully submitted,

Jordan L. Von Bokern* (D.C. Bar No.
1032962)
Tyler S. Badgley* (D.C. Bar No.
1047899)
U.S. CHAMBER LITIGATION
CENTER
1615 H Street NW
Washington, D.C. 20062
Tel: (202) 463-5337
jvonbokern@uschamber.com
tbadgley@uschamber.com

Liz Dougherty* (D.C. Bar No.
457352)
BUSINESS ROUNDTABLE
1000 Maine Avenue SW
Washington, D.C. 20024
202-872-1260
ldougherty@brt.org

* *Pro hac vice* pending

/s/ Robert L. Sayles
Robert L. Sayles (Texas Bar No.
24049857)
Boyce Holleman (Texas Bar No.
24126727)
BRADLEY ARANT BOULT
CUMMINGS LLP
1445 Ross Avenue
Suite 3600
Dallas, TX 75202
Tel: (214) 257-9800
Fax: (214) 939-8787
rsayles@bradley.com
bholleman@bradley.com

Jeffrey B. Wall* (Georgia Bar No.
750427)
Judson O. Littleton* (D.C. Bar No.
1027310)
SULLIVAN & CROMWELL LLP
1700 New York Avenue, N.W.
Washington, D.C. 20006-5215
Tel: (202) 956-7000
wallj@sullcrom.com
littletonj@sullcrom.com

*Counsel for Intervenors Chamber of
Commerce of the United States of
America, Business Roundtable, Texas
Association of Business, and Longview
Chamber of Commerce*

CERTIFICATE OF WORD COUNT

This Unopposed Motion to Intervene complies with the Procedures for Cases Assigned to District Judge Ada Brown and Standing Order, Rule II(A), because it contains 137 words.

/s/Robert L. Sayles

Robert L. Sayles

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7.1(b), I hereby certify that counsel for Intervenors conferred with Eugene Scalia and other counsel for plaintiff regarding Intervenors' intention to file this motion. Plaintiff's counsel stated that Plaintiff is unopposed to the relief requested herein. I further certify that I conferred with Rachael L. Westmoreland and other counsel for Defendant regarding Intervenors' intention to file this motion. Defendant's counsel stated that Defendant does not oppose Intervenors' request for intervention to the extent that it will not prejudice Defendant, but that Defendant opposes Intervenors' suggestion that, if intervention is granted, Intervenors' anticipated motion for preliminary relief could be resolved on the same briefing schedule recently entered by the Court on Plaintiff's motion to

stay. Defendant's position is fully set forth in Part C of in the attached brief in support of this motion.

/s/ Judson O. Littleton

Judson O. Littleton

Counsel for Movants

CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2024, I electronically transmitted the attached document to the Clerk of the Court and all counsel of record using the ECF System for filing and service in accordance with Local Rule 5.1.

/s/ Robert L. Sayles

Robert L. Sayles